

Jennie Lee Anderson (SBN 203586)  
 Lori E. Andrus (SBN 205816)  
**ANDRUS ANDERSON LLP**  
 155 Montgomery Street, Suite 900  
 San Francisco, California 94104  
 Telephone: 415-986-1400  
 jennie@andrusanderson.com  
 lori@andrusanderson.com

Adam J. Levitt (*pro hac vice*)  
**DICELLO LEVITT LLP**  
 Ten North Dearborn Street, Sixth Floor  
 Chicago, Illinois 60602  
 Telephone: 312-214-7900  
 alevitt@dicellolevitt.com

W. Daniel “Dee” Miles, III (*pro hac vice*)  
**BEASLEY, ALLEN, CROW,  
 METHVIN, PORTIS & MILES, P.C.**  
 272 Commerce Street  
 Montgomery, Alabama 36104  
 Telephone: 334-269-2343  
 dee.miles@beasleyallen.com

*Class Counsel*  
*(additional counsel appear on signature page)*

April N. Ross (*pro hac vice*)  
 Rachel P. Raphael (*pro hac vice*)  
**MORGAN, LEWIS & BOCKIUS LLP**  
 1111 Pennsylvania Avenue, N.W.  
 Washington, D.C. 20004  
 Telephone: (202) 739-3000  
 april.ross@morganlewis.com  
 rachel.rafael@morganlewis.com

Mark A. Feller (SBN 319789)  
**MORGAN, LEWIS & BOCKIUS LLP**  
 One Market  
 Spear Street Tower  
 San Francisco, CA 94105  
 Telephone: (415) 442-1000  
 mark.feller@morganlewis.com

Renee D. Smith (*pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
 333 W. Wolf Point Plaza  
 Chicago, IL 60654  
 Telephone: (312) 862-2310  
 renee.smith@kirkland.com

Richard C. Godfrey (*pro hac vice*)  
**QUINN EMANUEL URQUHART &  
 SULLIVAN, LLP**  
 191 N. Wacker Drive Suite 2700  
 Chicago, IL 60606  
 Telephone: (312) 705-7400  
 richardgodfrey@quinnemanuel.com

*Attorneys for General Motors LLC*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

RAUL SIQUEIROS, et al.,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 16-cv-07244-EMC

**STIPULATION AND JOINT MOTION  
 TO CONTINUE TO HOLD MOTIONS  
 IN ABEYANCE**

Hon. Edward M. Chen

1 Plaintiffs Joshua Byrge, Jill Cralley, Todd Cralley, William Davis, Jr., Gabriel Del Valle,  
2 Carlos Gamez, Larry Goodwin, John Graziano, Rudy Sanchez, Scott Smith, and Garet Tarvin (the  
3 “Plaintiffs”) and General Motors LLC (“GM”) (collectively, the “Parties”), hereby stipulate and  
4 jointly move this Court for an order continuing to hold pending motions in abeyance for ninety (90)  
5 days.

6 WHEREAS, on February 9, 2024, Plaintiffs filed their Motion for Final Judgment,  
7 Prejudgment Interest, Statutory Attorneys’ Fees, and Costs (ECF No. 654) and their Motion for  
8 Common Fund Attorneys’ Fees and Costs, and Class Representative Service Awards (ECF No.  
9 655) (“Fee Motions”) following a jury trial of the certified class claims in September and October  
10 2022.

11 WHEREAS, on September 18, 2024, the Court held a hearing on Plaintiffs’ Fee Motions,  
12 and instructed plaintiffs to provide a more precise estimate of the number of North Carolina class  
13 members by November 20, 2024.

14 WHEREAS, on October 2, 2024, Plaintiffs Tarvin, Del Valle, and Davis informed the Court  
15 of their consent to dismissal of their individual claims under Fed. R. Civ. P. 41(a)(1)(A)(ii) (ECF  
16 No. 703).

17 WHEREAS, on November 20, 2024, Plaintiffs filed a Motion for Authorization of Text  
18 Messaging to Potential Class Members, requesting the Court allow the Class Administrator to  
19 contact, via text messaging, potential North Carolina Class members whose membership has not  
20 yet been verified (ECF No. 704).

21 WHEREAS, on December 3, 2024, to preserve the status quo, the Parties filed a joint  
22 stipulation and joint motion to hold motions in abeyance while they explored potential resolution  
23 to this action (ECF No. 706.)

24 WHEREAS, on December 5, 2024, the Court granted that motion (ECF No. 707).

25 WHEREAS, the Parties have made substantial progress towards final resolution of this  
26 action.

27 IT IS HEREBY STIPULATED that, subject to this Court’s approval, all pending motions  
28 will continue to be held in abeyance for an additional ninety (90) days, up to and including June 1,

2025.

DATED: March 3, 2025

Respectfully submitted,

/s/Adam J. Levitt

Adam J. Levitt (*pro hac vice*)  
 John E. Tangren (*pro hac vice*)  
 Daniel R. Ferri (*pro hac vice*)  
 Blake Stubbs (*pro hac vice*)  
**DICELLO LEVITT LLP**  
 Ten North Dearborn Street, Sixth Floor  
 Chicago, Illinois 60602  
 Telephone: 312-214-7900  
 alevitt@dicellolevitt.com  
 jtangren@dicellolevitt.com  
 dferri@dicellolevitt.com  
 bstubbs@dicellolevitt.com

Mark Abramowitz (*pro hac vice*)  
**DICELLO LEVITT LLP**  
 7556 Mentor Avenue  
 Mentor, Ohio 44060  
 Telephone: 440-953-8888  
 mabramowitz@dicellolevitt.com

W. Daniel "Dee" Miles, III (*pro hac vice*)  
 H. Clay Barnett, III (*pro hac vice*)  
 J. Mitch Williams (*pro hac vice*)  
 Rebecca D. Gilliland (*pro hac vice*)  
**BEASLEY, ALLEN, CROW,  
 METHVIN, PORTIS & MILES, P.C.**  
 272 Commerce Street  
 Montgomery, Alabama 36104  
 Telephone: 334-269-2343  
 Dee.Miles@beasleyallen.com  
 Clay.Barnett@beasleyallen.com  
 Mitch.Williams@beasleyallen.com  
 Rebecca.Gilliland@beasleyallen.com

*Class Counsel*

Jennie Lee Anderson (SBN 203586)  
 Lori E. Andrus (SBN 205816)  
**ANDRUS ANDERSON LLP**  
 155 Montgomery Street, Suite 900  
 San Francisco, California 94104  
 Telephone: 415-986-1400

/s/April N. Ross

April N. Ross (*pro hac vice*)  
 Rachel P. Raphael (*pro hac vice*)  
**MORGAN, LEWIS & BOCKIUS LLP**  
 1111 Pennsylvania Avenue, N.W.  
 Washington, D.C. 20004  
 Phone: (202) 739-3000  
 april.ross@morganlewis.com  
 rachel.rafael@morganlewis.com

**MORGAN, LEWIS & BOCKIUS LLP**  
 Mark A. Feller (SBN 319789)  
 One Market  
 Spear Street Tower  
 San Francisco, CA 94105  
 Phone: (415) 442-1000  
 mark.feller@morganlewis.com

**KIRKLAND & ELLIS LLP**  
 Renee D. Smith (*pro hac vice*)  
 333 W. Wolf Point Plaza  
 Chicago, IL 60654  
 Phone: (312) 862-2310  
 renee.smith@kirkland.com

**QUINN EMANUEL URQUHART &  
 SULLIVAN, LLP**  
 Richard C. Godfrey (*pro hac vice*)  
 191 N. Wacker Drive Suite 2700  
 Chicago, IL 60606  
 Phone: (312) 705-7400  
 richardgodfrey@quinnemanuel.com

*Attorneys for General Motors LLC*

jennie@andrusanderson.com  
lori@andrusanderson.com

Anthony J. Garcia (pro hac vice)

**AG LAW P.A.**

3602 West Euclid Avenue

Tampa, Florida 33629

Telephone: 813-259-9555

anthony@aglawinc.com

*Additional Counsel for Plaintiffs and the  
Classes*

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this \_\_\_\_ day of \_\_\_\_\_, 2025

\_\_\_\_\_  
THE HONORABLE EDWARD M. CHEN  
UNITED STATES DISTRICT JUDGE